

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	CHAPTER 13
	:	
DAISY HURTADO,	:	CASE NO. 18-12234
	:	
DEBTOR.	:	HON. ASHELY M. CHAN
	:	

**STIPULATION AND CONSENT ORDER PERMITTING
LATE FILED CLAIM OF GELT PROPERTIES, LLC, AS
SUCCESSOR-BY-MERGER OF GELT FINANCIAL CORPORATION**

WHEREAS, on April 2, 2018, Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code in the Eastern District of Pennsylvania, designated as Case No. 18-12234; and

WHEREAS, Debtor failed to include Gelt Properties, LLC, as successor-by-merger of Gelt Financial Corporation (“Gelt”) on the creditor matrix; and

WHEREAS, the filing deadline for creditors to file a Proof of Claim was June 11, 2018; and

WHEREAS, Gelt did not receive timely notice of these bankruptcy proceedings; and

WHEREAS, Debtor will be filing amended Schedules and Plan to address the claim of Gelt; and

WHEREAS, in lieu of filing a Motion, the parties have agreed to permit the untimely claim of Gelt;

WHEREAS, this submittal is upon notice to the appointed Chapter 13 Trustee; and

NOW THEREFORE, the parties having conferred and agreed upon the terms of this Order, and for good cause shown, it is hereby:

ORDERED that Gelt Properties, LLC shall file a Proof of Claim by August 27, 2018; and it is further

ORDERED that the Proof of Claim of Gelt will be deemed timely filed;

BY THE COURT:

Honorable Ashely M. Chan
United States Bankruptcy Judge

The undersigned hereby consent to the form, entry and substance of the within Consent Order:

JENSEN BAGNATO, P.C.

By: /s/ Erik B. Jensen
Erik B. Jensen, Esquire
Attorney for Debtor,
Daisy Hurtado

Dated: August 24, 2018

EISENBERG, GOLD & AGRAWAL, P.C.

By: /s/ Andrew L. Unterlack
Andrew L. Unterlack, Esquire
Attorneys for Creditor,
Gelt Properties, LLC

Dated: August 24, 2018